

KEKER  
VAN NEST  
& PETERS

LATHAM & WATKINS LLP

MORRISON FOERSTER

June 3, 2025

**VIA ECF**

Hon. Sidney H. Stein  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

cc: All Counsel of Record (via ECF)

Re: *In re: OpenAI, Inc., Copyright Infringement Litigation*, Case No. 1:25-md-03143

Dear Judge Stein:

On behalf of the OpenAI defendants,<sup>1</sup> we write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument on OpenAI's concurrently filed objection to Magistrate Judge Wang's May 13, 2025 Preservation Order at *MDL* ECF 33.

Respectfully,

KEKER, VAN NEST  
& PETERS LLP

LATHAM & WATKINS LLP

MORRISON &  
FOERSTER LLP

/s/ Edward A. Bayley

Edward A. Bayley\*

/s/ Elana Nightingale Dawson

Elana Nightingale Dawson

/s/ Joseph C. Gratz

Joseph C. Gratz\*

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<sup>1</sup> OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

\* All parties whose electronic signatures are included herein have consented to the filing of this document.